

McGuireWoods LLP  
2001 K Street N.W.  
Suite 400  
Washington, DC 20006-1040  
Phone: 202.857.1700  
Fax: 202.857.1737  
www.mcguirewoods.com

William J. Farah  
Direct: 202.828.2812

McGUIREWOODS

RECEIVED  
2012 NOV 21 PM 2:08  
FEC MAIL CENTER

wfarah@mcguirewoods.com

November 21, 2012

Mr. Jeff S. Jordan  
Supervisory Attorney  
Complaints Examination & Legal Administration  
Federal Election Commission  
999 E Street NW  
Washington, D.C. 20463

2012 NOV 21 PM 2:13  
OFFICE OF THE  
COMPTROLLER  
FEDERAL ELECTION COMMISSION

RE: MUR 6621; Supplemental Submission

Dear Mr. Jordan:

This letter supplements the September 17, 2012 submission of the American Hotel & Lodging Association ("AH&LA") and the American Hotel & Lodging Association Political Action Committee ("HotelPAC") made in connection with the above-captioned matter.

The Broadmoor Hotel ("Broadmoor") has provided AH&LA with a copy of its November 16, 2012 submission to the Federal Election Commission ("FEC") made in regards to this matter. While AH&LA does not agree with some of the characterizations and other statements contained therein, those differences are inconsequential to the resolution of this matter because it is indisputable that the 2010 solicitation of Broadmoor Golf Club members ("Club Members") was improper, as evidenced by AH&LA's decision not to deposit Club Member contributions in HotelPAC's bank account that year. AH&LA recognizes that its guidance and monitoring of the content and timing of the Broadmoor's communications with Club Members were inadequate and that this resulted in miscommunications and misunderstandings that led to the transgression.

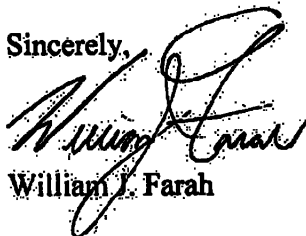
Moreover, in reviewing the Broadmoor's submission, it now appears evident that the 2011 solicitation of Club Members was flawed as well. The documents and statements included in the Broadmoor's submission indicate that communications to Club Members that year simultaneously invited them to join AH&LA while also soliciting them to contribute to HotelPAC. As indicated in AH&LA's submission, fourteen Club Members accepted the invitation to join AH&LA in 2011; HotelPAC records indicate that ten made contributions to HotelPAC totaling \$9,515.00.

13044350111

November 21, 2012  
Page 2

As previously stated, any disagreement as to the extent to which the Broadmoor relied on AH&LA's guidance and/or misunderstood AH&LA's instructions does not alter the result: The 2010 solicitation of Club Members was improper, and the 2011 solicitation of Club Members also appears to have been improper. AH&LA alone is accountable to the FEC for these mistakes.

Sincerely,

A handwritten signature in dark ink, appearing to read "William J. Farah", written over a dotted line.

William J. Farah

13044350112